

DANIEL G. BOGDEN
 United States Attorney
 ROBERT A. KNIEF
 Assistant United States Attorney
 Lloyd D. George United States Courthouse
 DISTRICT OF NEVADA
 333 Las Vegas Boulevard South, Suite 5000
 Las Vegas, Nevada 89101
 Telephone: (702) 388-6336

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
OCT 20 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,) CRIMINAL INDICTMENT

Plaintiff,

) Case No.: 2:15-cr- 291

vs.

) Violations:

SUREN BABAYAN, and

) Counts One - Three

ARSEN GRIGORYAN,

) 18 U.S.C. § 2342(a)

) Trafficking in Contraband Cigarettes

Defendants.

) Counts Four – Sixteen

) 18 U.S.C. §§ 1956(a)(1)(A)(i) and (B)(ii)

) Money Laundering

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Trafficking in Contraband Cigarettes)

On or about November 14, 2014, in the State and Federal District of Nevada,

SUREN BABAYAN,

defendant herein, did knowingly and unlawfully ship, transport, receive, possess, and purchase contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of the payment of applicable State cigarette taxes in the State of Nevada, in violation of

1 Title 18, United States Code, Section 2342(a).

2 **COUNT TWO**

(Trafficking in Contraband Cigarettes)

3
4 From on or about March 9, 2015 through March 16, 2015, in the State and Federal
5 District of Nevada,

6 **SUREN BABAYAN,**

7 defendant herein, did knowingly and unlawfully ship, transport, receive, possess, and
8 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,
9 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of
10 the payment of applicable State cigarette taxes in the State of Nevada, in violation of
11 Title 18, United States Code, Section 2342(a).

12 **COUNT THREE**

(Trafficking in Contraband Cigarettes)

13 On or about July 8, 2015, in the State and Federal District of Nevada,

14 **ARSEN GRIGORYAN,**

15 defendant herein, did knowingly and unlawfully ship, transport, receive, possess, and
16 purchase contraband cigarettes, as that term is defined in Title 18, United States Code,
17 Section 2341, to wit: a quantity of more than 10,000 cigarettes which bore no evidence of
18 the payment of applicable State cigarette taxes in the State of Nevada, in violation of
19 Title 18, United States Code, Section 2342(a).

20 **COUNT FOUR**

(Money Laundering)

21
22 On or about November 16, 2014, in the State and Federal District of Nevada,

23 **SUREN BABAYAN**

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of ten \$1000 MoneyGram money orders as shown below

Serial #	Time	Amount	Street Address	City	Location
20485749181	13:00	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749182	13:00	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749183	13:03	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749184	13:03	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749185	13:24	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749186	13:24	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20576118309	19:07	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118310	19:07	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118313	19:16	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118314	19:17	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:

trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

COUNT FIVE
(Money Laundering)

On or about November 17, 2014, in the State and Federal District of Nevada,

SUREN BABAYAN

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of twenty \$1000 MoneyGram money orders as shown

below:

Serial #	Time	Amount	Address	City	Location
20485749215	13:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749216	13:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20577592822	13:56	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592823	13:57	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118333	15:56	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118334	15:56	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20485749222	16:35	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749223	16:36	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749227	19:34	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749228	19:34	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20576118355	20:10	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118356	20:12	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20577592837	20:19	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592838	20:19	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592839	20:22	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577592840	20:22	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118357	20:56	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118358	20:56	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118359	20:59	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118360	20:59	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:

trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

COUNT SIX
(Money Laundering)

On or about November 18, 2014, in the State and Federal District of Nevada,

SUREN BABAYAN

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of sixteen \$1000 MoneyGram money orders as shown below

Serial #	Time	Amount	Address	City	Location
20584668006	08:51	\$1,000	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20584668007	08:51	\$1,000	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20485749240	10:52	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749241	10:53	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20577593353	11:34	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577593354	11:34	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118383	12:38	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118384	12:39	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118400	16:14	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118401	16:14	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20485749249	16:41	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749250	16:41	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749254	20:25	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749255	20:26	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749256	20:27	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749257	20:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:

trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

COUNT SEVEN
(Money Laundering)

On or about November 19, 2014, in the State and Federal District of Nevada,

SUREN BABAYAN

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit the purchase of nineteen MoneyGram money orders as shown below

Serial #	Time	Amount	Street Address	City	Location
20584668030	08:45	\$1,000	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20584668031	08:45	\$1,000	2310 E Serene Ave	Las Vegas	Wal-Mart - #2593
20586135630	10:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20586135631	10:28	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20576118422	13:15	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118423	13:15	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118425	13:36	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118426	13:36	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20485749269	13:38	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749270	13:39	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749271	13:41	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20485749272	13:41	\$1,000	5200 S Fort Apache Rd	Las Vegas	Wal-Mart - #5070
20577593385	18:30	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577593386	18:30	\$1,000	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20577593387	18:30	\$900	3615 S Rainbow Blvd	Las Vegas	Wal-Mart - #1584
20576118438	19:19	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118439	19:19	\$600	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118440	19:21	\$1,000	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356
20576118441	19:21	\$500	7200 Arroyo Cross Pkwy	Las Vegas	Wal-Mart - #4356

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:

trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law, and that while conducting such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).

COUNTS EIGHT – SIXTEEN
(Money Laundering)

On or about the dates listed below, in the State and Federal District of Nevada,

SUREN BABAYAN

defendant herein, did knowingly conduct financial transactions affecting interstate commerce, to wit cash deposits into JP Morgan Chase Bank account xxxxx1575 as shown below

Count	Date	Amount
Eight	February 17, 2015	\$9,000
Nine	February 18, 2015	\$9,000
Ten	February 19, 2015	\$9,500
Eleven	February 25, 2015	\$9,500
Twelve	March 4, 2015	\$9,500
Thirteen	March 5, 2015	\$9,800
Fourteen	March 6, 2015	\$9,800
Fifteen	March 9, 2015	\$9,500
Sixteen	March 10, 2015	\$9,900

which involved the proceeds of a specified unlawful activity, that is trafficking in contraband cigarettes in violation of 18 U.S.C. § 2342(a),

(1) with the intent to promote the carrying on of specified unlawful activity, to wit:

trafficking in contraband cigarettes; and

(2) knowing that the transactions were designed in whole or part to avoid a reporting requirement under Federal law,

1 and that while conducting such financial transactions knew that the property involved in
2 the financial transactions represented the proceeds of some form of unlawful activity.

3 All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(ii).
4

5 **DATED:** This 20th day of October, 2015

6 **A TRUE BILL:**
7

8 /S/
9 FOREPERSON OF THE GRAND JURY

10 DANIEL G. BOGDEN
11 United States Attorney

12 
13 ROBERT A. KNIEF
Assistant United States Attorney
14
15
16
17
18
19
20
21
22
23